REMARKS

This is intended as a full and complete response to the Office Action dated March 25, 2005, having a shortened statutory period for response set to expire on June 25, 2005. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-27 are pending in the application. Claims 1-27 remain pending following entry of this response. Claims 1, 12, and 16 have been amended to clarify the invention. Applicants respectfully submit that the amendments do not introduce new matter.

Claim Rejections - 35 U.S.C. § 103

Claims 1, 3-5, 7-9, 12-14, 16, 18-20 and 22-24 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Veditz et al.* ("*Veditz*"), U.S. Patent No. 6,496,793, in view of *Watanabe et al.* ("*Watanabe*"), U.S. Patent No. 6,185,729. Applicants respectfully traverse this rejection.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. *See* MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* MPEP § 2143. The present rejection fails to establish at least the third criteria because the cited references, alone or in combination, fail to teach retrieving locale information contained in a client request if the client request does not include a request character set designation.

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Examiner cites *Veditz* at Fig. 3B and Col. 3, Lines 29-31, for the proposition that locale information contained in the client request is retrieved if a client request does not include the request character set designation.

In this case, *Veditz* does not disclose "each and every element as set forth in the claim". Specifically, *Veditz* does not disclose "determining whether a client request includes, as part of the network communication protocol, a request character set designation and if the client request does not include the request character set designation, retrieving locale information contained in the client request". The Examiner argues that *Veditz* discloses "determining whether a client request includes, as part of the network communication protocol, a request character set designation and if the client request does not include the request character set designation, retrieving locale information contained in the client request" at Figs. 3A, 2C, and 3B and Col. 3, Lines 29-31. However, the cited figures and section in fact refer to comparison of a Local Language Driver Identifier (Local LDID) from a data file to an Active Local Language Driver Identifier (Active LDID) for a system.

In *Veditz*, a Language Driver Identifier (LDID) identifies a language driver that was in use when data objects were created or modified. *See* Col. 12, Lines 50-60. The Local LDID identifies the language support under which a file was created or modified. *See* Col. 7, Lines 29-39. The Active LDID identifies the language driver currently employed by a system. *See* Col. 7, Lines 40-45. Accordingly, both types of LDID store the same type of information, namely information about **language drivers**. *See* Col. 7, Lines 29-45. In *Veditz*, this information is compared to determine if the language drivers for the data file and the system are compatible. *See* Col. 7, Lines 45-55. If there is a language driver mismatch, the user is presented with options for selecting a desired course of action. *See* Col. 7, Lines 45-60. Accordingly, *Veditz* discloses a comparison operation between two like types of data from different sources.

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In contrast, the pending claims describe determining whether a client request includes, as part of the network communication protocol, a request character set designation and if the client request does not include the request character set designation, retrieving locale information contained in the client request. Thus, the client request is examined to determine if it has a first type of information, namely a request character set designation. If the client request does not include a request character set designation, a second type of information (locale information) is retrieved from the client request. Accordingly, the pending claims describe two types of information from a single source, whereas *Veditz* describes one type of information from two sources.

In summary, in the context of determining an appropriate character set, *Veditz* does not teach:

> (1) Referring to two types of data (character set designation and locale information); rather, *Veditz* teaches one type of data (the LDID);
>
> (2) Using information from a client request; rather, *Veditz* uses information from a system and a data file; and
>
> (3) Determining whether a client request includes data (a request character set designation); rather, *Veditz* teaches a mere comparison of data (LDIDs) from two different sources (a data file and a system).

With respect to *Watanabe*, *Watanabe* discloses a multibyte English locale used to discover and correct errors by English speaking developers of software. However, *Watanabe* does not disclose anything further with respect to the features discussed above. Therefore, the references cited by the Examiner, either alone or in combination, do not teach, show or suggest the features discussed above. Accordingly, withdrawal of the rejection is respectfully requested.

Claims 2, 6, 10, 11; 17, 21, 26 and 27 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Veditz* in view of *Horn et al.* ("*Horn*"), U.S. Patent Application Publication No. 2002/0156688. Applicant respectfully traverses this rejection. *Veditz* is

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believed to be overcome for the reasons described above. Accordingly, the present rejection over *Veditz* in view of *Horn* is also believed to have been overcome.

Claims 15 and 25 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Veditz* et al. in view of *Kan et al.* ("*Kan*"), U.S. Patent Application Publication No. 2003/0088544. Applicant respectfully traverses this rejection. Again, *Veditz* is believed to be overcome for the reasons described above. Accordingly, the present rejection over *Veditz* in view of *Kan* is also believed to have been overcome.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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